Appl. No. 10/711,342
Amdt. Dated June 19, 2008
Reply to Office Action of April 14, 2008

Attorney Docket No.
Customer No.: 53720

REMARKS/ARGUMENTS

No claims are amended. Claims 1-48 are pending in the application. Reexamination and reconsideration of the application are respectfully requested.

Claims 22, 23, 27, 28, 30, 38, 40 and 45 were rejected as being anticipated by IPMI, "Intelligent Platform Management Interface Specification" v1.5 (hereinafter IPMI Specification). This rejection is respectfully traversed.

Regarding claim 22, this claim recites an advanced IPMI system which includes "<u>a plurality of message service modules</u> which designates each IPMI message a default execution procedure, correspondingly; <u>a programmable-configured message sheet which allows the user to define the corresponding relation between each IPMI message and said message service module</u>; and a plurality of programmable-configured message processing units which concurrently multi-process the IPMI messages ..., by way of <u>each message processing unit looking up the corresponding message service module of the message sheet according to each IPMI message and initiating the execution procedure of the message service module for executing the IPMI message</u>." (Emphasis added.) This feature is discussed in paragraphs [0053] and [0086] of the present disclosure.

This feature is not disclosed or suggested by the IPMI Specification. The portions of the IPMI Specification cited by the Examiner, 1.6.23 - 1.6.24, discuss platform event filtering and call down lists and alert policies. However, the reference does not teach or suggest "a plurality of message service modules", nor a "message sheet which allows the user to define the corresponding relation between each IPMI message and said message service module." In the IPMI Specification, the configurable alert policies determine how an alert will be processed (see IPMI 1.6.24); they do not determine which one of a plurality of message service modules a message should be sent to for execution, which is required by claim 22. Accordingly, claim 22 and its dependent claim 23 are patentable over the IPMI Specification.

Regarding claim 27, this claim recites an advanced IPMI system which includes "an operating system (OS) management module <u>having multiple specific mapping functions for communicating with different types of OS</u>, allowing the advanced IPMI system to function with different OS." (Emphasis added.) This feature is discussed in paragraphs [0056] and [0088] of the present disclosure. This feature is not disclosed or suggested by the IPMI Specification. The IPMI Specification teaches that the IPMI system can be used in conjunction with system

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management software running under the operating system (see IPMI Specification 1.6.2 - 1.6.3 cited by the Examiner). While this disclosure implies that the IPMI system can be configured by the manufacturer to work with any one of a number of OSs, the IPMI Specification does not teach or suggest an OS management module that has "multiple specific mapping functions for communicating with different types of OS" as required by claim 27.

In addition, the advanced IPMI system of claim 27 includes "a hardware management module having a plurality of driver units for communicating with different baseboard management controller (BMC), allowing the advanced IPMI system to function in different hardware environments." IPMI Specification 1.6.2 - 1.6.3 does not show such a hardware management module. Although it mentions "connecting addition management controllers to the system using the IPMB", there is no description of a component with a plurality of driver units for the different BMCs.

Accordingly, claim 27 is patentable over the IPMI Specification.

Regarding claim 28, this claim recites an advanced IPMI system which includes a sensor unit having an EEPROM which stores a sensing event, and "a memory control unit which regularly poll a new sensing event in the EEPROM of the sensor unit …." (Emphasis added.) This feature is discussed in paragraphs [0057] and [0087] of the present disclosure. This feature is not disclosed or suggested by the IPMI Specification. The IPMI Specification 1.6.9 describes that the Sensor Data Records (SDR) are kept in a single, centralized non-volatile storage area that is managed by the BMC. Paragraph 1.6.10 describes that FRU (Field Replaceable Unit) information is held in SEEPROMs. Paragraph 1.6.14 (the section cited by the Examiner) discusses the linkage between events and FRU information. However, these paragraphs has no description of a memory controller regularly polling sensing events in a sensor unit's memory as required by the above-quoted element of claim 28. Accordingly, claim 28 is patentable over the IPMI Specification.

Regarding claim 30, this claim recites an advanced IPMI system which includes an I^2C sensor and related I^2C driver software and I^2C driver management unit. These features are discussed in paragraphs [0057] of the present disclosure. The Examiner cited Figure 2-1 of the IPMI Specification which shows a "non-intelligent I^2C sensor" connected to the IPMB. The Examiner also cites 29.15 as evidence of I^2C sensor driver software and driver management unit. The applicant submits, however, that the IPMI Specification does not teach or suggest "a

plurality of I²C driver software for driving different I²C sensors; and an I²C driver management unit for managing said plurality of I²C driver software with an application interface" as recited in claim 30. By using the claimed I²C driver management unit to manage a plurality of drivers, the advanced IPMI can work with a number of platforms without the need to modify or rewrite the drivers. The system described in the IPMI Specification does not have such a feature.

Regarding claim 38, this claim recites a method for an advanced IPMI system including a step of "by a plurality of programmable-configured message processing units, multi-processing concurrently the IPMI messages, each initiating according to each IPMI message a message service module having a default execution procedure." (Emphasis added.) The Examiner cited paragraphs 1.6.23 and 1.6.25 of the IPMI Specification for teaching this feature. Paragraph 1.6.23 describes Platform Event Filtering; it does not teach or suggests concurrent multi-processing of messages. Paragraph 1.6.25 describes Channel Model; it teaches a plurality of channels for routing IPMI messages, but still does not teach or suggest concurrent multi-processing of messages. Accordingly, claim 38 and its dependent claim 40 are patentable over the IPMI Specification.

Regarding claim 45, this method claim is similar to apparatus claim 28 in that it requires "polling regularly by a memory control unit a new sensing event in the EEPROM of the sensor unit." Thus, for the same reasons as explained in connection with claim 28, claim 45 is patentable over the IPMI Specification.

Claims 1-21, 24-26, 31-37, 39, 41-44 and 46-48 were rejected as being obvious over the IPMI Specification in view of Khacherian, U.S. Pat. Appl. Pub. 2003/0063618. This rejection is respectfully traversed.

Independent claims 1 recites an advanced IPMI system which includes "a central message buffer unit having a memory block which provides a pointer of a corresponding address in the block for temporary storage of each IPMI message wherein each said subsystem just transmits the pointer therebetween thereby reducing times of reading the IPMI message and raising the performance of the IPMI system." In rejecting claim 1, the Examiner admitted that the IPMI Specification fails to teach or suggest this element of claim 1. The Examiner cited the Khacherian reference for teaching transmitting memory pointers. The Khacherian reference relates to a variable length switch fabric for switching variable length data packets between input and output transmission paths in a communication network. The switch has an Enqueue engine

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which uses an address pointer to activate a data transfer operation. Data in the input FIFO is transferred via the crossbar switch to a strip memory and stored at the address specified by the address pointer. The Enqueue engine then transmits the address pointer to a selected head pointer FIFO associated with the output FIFO where the data is to be switched. Using the memory pointer, a Dequeue engine transfers the stored data from the strip memory to the output ports, and thereby effectuate the switching process. See Khacherian, paragraphs [0029] - [0035].

The applicant respectfully submits that it would not have been obvious to combine Khacherian with the IPMI Specification. Unlike Khacherian, the IPMP system is not a switch. Thus, claim 1 is patentable over the IPMI Specification in view of Khacherian.

Independent method claim 31 is similar to claim 1 in that it recites "storing temporarily each said IPMI message in a central message buffer unit and therefore getting a pointer of a corresponding address in the buffer unit for each said IPMI message; transmitting said pointer to a message execution group; by the message execution group, executing the IPMI message according to the pointer thereby generating a response message and a response pointer to a corresponding address for temporary storage of the response message in the central message buffer unit; ..." Therefore, for the same reasons as discussed above,

Accordingly, claims 1 and 31, as well as claims 2-21 and 32-37 that depend thereon, are patentable over the IPMI Specification in view of Khacherian.

Claims 24-26 depend from claim 22, claims 39 and 41-44 depend from claim 38, and claims 46-48 depend from claim 45. As discussed earlier, the IPMI Specification fail to teach or suggest various elements of claims 22, 38 and 45. The Khacherian reference does not cure these deficiencies of the IPMI Specification because Khacherian relates to a switch and does not teach anything about an IPMI system. Accordingly, claims 24-26, 39, 41-44 and 46-48 are patentable over the IPMI Specification in view of Khacherian.

The art made of record but not relied upon by the Examiner (US 2005/0114549) has been considered. However, it is submitted that this art neither describes nor suggests the presently claimed invention.

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance. Reexamination and reconsideration of the application, as amended, are requested. If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is invited to call the undersigned attorney at the Los Angeles, California telephone

number (213) 625-5076 to discuss the steps necessary for placing the application in condition for

allowance.

If there are any fees due in connection with the filing of this response or deficient in fees,

please charge the fees to our Deposit Account No. 50-3531.

Respectfully submitted,

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